


U.S. DISTRICT COURT  
NORTHERN DIST. OF TX  
DALLAS DIVISION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

2022 JUN -6 PM 5:01

DEPUTY CLERK 

UNITED STATES OF AMERICA

v.

THOMAS JOHN BOUKAMP

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CASE NO.: 5:20-CR-165-H  
(ECF)

**DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS**

In accordance with this Court's Pretrial Order, Defendant THOMAS JOHN BOUKAMP respectfully submits the attached proposed voir dire questions and respectfully requests that the jury be questioned in accordance with those submissions:

1. Do you personally know Callie Woolam, Jeff Haag, or any staff of the U.S. Attorney's Office? Have you ever been employed by the United States Attorney's Office anywhere in the United States?
2. Is someone close to you employed or associated with the United States Attorney's Office, the Department of Justice, or any other department or agency of the United States Government?
3. Do you personally know Judge Wesley Hendrix, or any of the courtroom staff?
4. Do you personally know me or my stand by counsel, Wade Iverson, or anybody employed by the Federal Public Defender's Office?
5. The Government and I have submitted a list of possible witnesses. Judge Hendrix is going to read each name, if any of the names sound familiar please raise your hand.

If a juror indicates some possible knowledge of a person from the witness list, Defendant requests the Court ascertain the basis of the juror's acquaintance and then determine if it is a person from the list or if it would have an effect on the jury to be fair and

impartial.

6. Do you know any other members of this jury panel?
7. Do you or someone close to you either now have or at any time in the past had any business or contractual relationships with any office or agency of the United States Government? Or Has any member of the panel, their immediate family members or close personal friends been employed by the federal, state, county, or city government?
8. Have you ever served on a jury before?
  - A. If so, was it a grand jury or a trial jury;
  - B. was it in State or Federal Court;
  - C. in what year did you serve;
  - D. what kind of case did you sit on—Civil or Criminal;
  - E. did the jury reach verdict in that case—what was the verdict;
  - F. and after your service was completed, did anyone say anything to you
9. Will you hold it against me that I'm not an attorney?
10. Do any of you have any medical or physical problems that might affect your ability to serve as a juror or serve as a juror?
11. Are any of you currently taking any medication that might interfere with your ability to concentrate in the testimony and serve as a juror?
12. Do any of you have personal or business plans (such as commitments to outof-town travel) in the near future that would make it difficult for you to serve as a juror?
13. Do any of you have any personal or family responsibilities (such as full-time care of a young child or of an ill or elderly person) that would interfere with your service as a juror?

14. Do any of you have responsibilities on your job that would make it impossible for you to serve as a juror on a trial?
15. Have you, an immediate family member or a close personal friend, been a complaining witness or a victim in a criminal case?
16. Have you ever been personally interested in the outcome of a criminal case? Discuss circumstances.
17. Have you ever been a witness in court or given your testimony under oath? Discuss circumstances.
18. Have you or someone close to you served as a federal, state, or local peace officer?
19. Have you or someone close to you been employed by or associated with any law enforcement agency?
20. Have you or someone close to you received any kind of special training in law enforcement or law?
21. Do any of you have any specialized training, education, knowledge, or expertise about computers and the internet?
22. Do any of you have any specialized training, education, knowledge, or expertise in digital forensics or work with cell phone records or devices?
23. Are there any members of the panel who would believe the testimony of a government agent or employee over the testimony of a private citizen solely because he or she is a government employee or agent? Or the opposite?
24. Do each of you understand that the burden of proof in a criminal case is much greater than the burden of proof in a civil case?

25. Does the Government have to prove my guilt beyond a reasonable doubt for each element of the offense charged for a finding of guilty to be made by you?
26. Am I presumed innocent until that burden of proof is met?
27. Do I have to prove that I am innocent at any point in the trial?
28. Do I have to prove that I am not guilty at any point in the trial?
29. Would you hold it against me if I didn't offer evidence to prove my innocence?
30. Would you hold it against me if I remained silent?
31. Is an indictment evidence?
32. Is an indictment merely an accusation? Or is it something more? If you think it is something more please raise your hand?
33. Does anybody think that I must have done something wrong to be in Court today?
34. Do you guys understand that sitting here before you, I am not any more guilty than any of you?
35. Do I have to explain anything or offer any evidence before you find me not guilty?
36. Do you understand the prosecution or Judge's comments are not evidence in this case?
37. Should the fact that it says United States versus me influence your decision?
38. By law, as jurors, do you understand you are to be the sole judges of the facts in this case?
39. Will you give great deference to the Court on questions of law?
40. Do you understand that by the same law, you are all the sole judges of the law in this case as well?
41. Will you decide this case on the evidence or lack of evidence provided?
42. Do each of you understand that the verdict in this case has to be unanimous and it is not a

situation where the majority wins?

43. When you retire to the jury room to reach your verdict, will each of you cast your personal vote even if you are in the minority in that vote? Would the fact that you were in the minority influence your vote at all?

44. Is there any member of the panel who does not agree with our law which places the burden of proof of every allegation in the indictment beyond a reasonable doubt on the Government to such an extent that they would not be able to comply with the law?

45. Will each of you wait until all of the evidence is in before making up your minds about the case?

46. If the prosecution fails to prove the guilt of an accused beyond a reasonable doubt, is there any one of you that would hesitate to return a verdict of not guilty?

**Defendant Requests that the Court ask the Following Questions**

1. Do all of you agree and believe that Mr. Boukamp is entitled to a fair and impartial jury?

If there is anything you believe the court should be aware of that could possibly bring into question your impartiality in this case, please raise your hand and we will discuss it out of the hearing of the other panel members?

2. This case involves an alleged minor victim, will that make any of you prejudiced against Mr. Boukamp?

3. This case involves an alleged the alleged production of child pornography, will that make any of you prejudiced against Mr. Boukamp?

4. This case involves the allged emotional and physical brutalization of a poor, defenseless

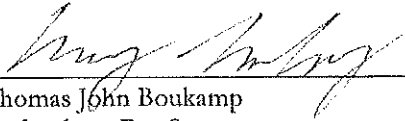
child, will that prejudice you against Mr. Boukamp?

5. Do any of you occasionally watch the local news?

6. Do any of you recall any story of a missing teenager from Lubbock?

7. Have any of you potentially seen news or information about this case in the papers, on social media, or otherwise?

8. Have you or anybody close to you ever been the perpetrator or victim of emotion of sexual abuse?

  
Thomas John Boukamp  
Defendant *Pro Se*